



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL VEHICLE AND FUEL EMISSIONS LABORATORY
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OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Post-Proposal Meetings with Stakeholders for 2012 NCP Rulemaking

FROM: Chuck Moulis, Senior Environmental Engineer
Assessment and Standards Division

TO: Docket Number EPA-HQ-OAR-2011-1000

DATE: August 21, 2012

EPA staff from the Assessment and Standards Division (ASD) met with all outside stakeholders who requested meetings during the comment period to discuss the 2012 Nonconformance Penalty (NCP) proposed rulemaking. This memorandum summarizes the three meetings and teleconferences with ASD staff. Meetings and teleconferences involving EPA staff outside of ASD are addressed in separate memoranda.

PACCAR Teleconference

EPA and PACCAR held a teleconference on February 12, 2012 to discuss the NCP levels in the Notice of Proposed Rulemaking. The attendees included:

- PACCAR – Dan Kieffer and Edward Wheeler
- EPA – Matt Spears, Chuck Moulis, and Angela Cullen

EPA provided clarification to PACCAR regarding the cost elements used to develop the NCP level. PACCAR expressed their opinion that the NCP levels were too low and that they had expected the levels to include a difference in fuel costs.

Cummins Meeting

EPA met with Cummins in Columbus, Indiana on March 8, 2012 to discuss several issues, including the NCP rulemaking. The attendees included:

- Cummins – John Wall, Brian Mormino, Jackie Yeager, Robert Jorgensen, and Bridget Revier
- EPA – Chet France, Matt Spears, Chuck Moulis, Angela Cullen, and Houshun Zhang

At the meeting, Cummins reiterated its comments from the public hearing stating the NCP levels were too low and presented its cost analysis. EPA and Cummins also held a teleconference on March 2, 2012 to discuss the agenda for this March 8 meeting.

Volvo Meeting

EPA met with Volvo in Ann Arbor, Michigan on March 26, 2012 to discuss the NCP rulemaking. The attendees included:

- Volvo – Tony Greszler, Susan Alt, and Jeff Marley
- EPA – Matt Spears, Chuck Moulis, Angela Cullen, and Houshun Zhang

At the meeting, Volvo reiterated its comments from the public hearing and provided to EPA confidential business information showing details of Volvo's compliance costs and the cost analysis supporting its recommended NCP level.